

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

COMMONWEALTH OF  
PENNSYLVANIA,

Plaintiff,

v.

DONALD J. TRUMP, *et al.*,

Defendants.

Case No. 2:17-CV-04540-WB

Hon. Wendy Beetlestone

**NOTICE OF MOTION AND MOTION  
FOR LEAVE TO APPEAR AS *AMICI*  
*CURIAE* AND TO FILE AN *AMICUS*  
BRIEF IN SUPPORT OF THE MOTION  
OF THE COMMONWEALTH OF  
PENNSYLVANIA FOR A PRELIMINARY  
INJUNCTION**

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that before the Honorable Wendy Beetlestone, United States District Court, Eastern District of Pennsylvania, Philadelphia Division, 601 Market Street, Suite 3809, Philadelphia, PA, Non-Parties American Association of University Women (“AAUW”); American Federation of State, County, Municipal Employees (AFL-CIO) (“AFSCME”); Service Employees International Union (“SEIU”); and 11 Additional Professional, Labor, and Student Associations (collectively, “Amici Curiae”) move the Court for an order granting them leave to appear as *amici curiae* and to file the *amicus* brief attached as Exhibit A to their Memorandum In Support of Motion For Leave to Appear as *Amici Curiae* and to File an *Amicus* Brief in Support of the Motion of the Commonwealth of Pennsylvania For a Preliminary Injunction.

This Motion is based on this Notice of Motion and Motion, the Memorandum in support thereof, the Proposed Order Granting Leave to Appear as *Amici Curiae* and to File an *Amicus* Brief, the Certificate of Service for these documents, the pleadings and other papers on file herein, and such other written and oral argument as may be presented to the Court.

Counsel for Defendants takes no position on the filing of *amicus* briefs in this action.

Dated: November 27, 2017

Respectfully submitted,

By: /s/ Jamie A. Levitt  
Jamie A. Levitt

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American Federation of State, County,  
Municipal Employees (AFL-CIO)  
(“AFSCME”); Service Employees  
International Union (“SEIU”) and 11  
Additional Professional, Labor, and Student  
Associations*

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**CERTIFICATE OF SERVICE**

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**CERTIFICATE OF SERVICE**

I declare that I am employed with the law firm of Morrison & Foerster LLP, whose address is 250 West 55th Street, New York, New York 10019-9601. I am not a party to the within cause, and I am over the age of eighteen years.

I further declare that on November 27, 2017, I served a true and correct copy of:

**NOTICE OF MOTION AND MOTION FOR LEAVE TO APPEAR AS *AMICI CURIAE* AND TO FILE AN *AMICUS* BRIEF IN SUPPORT OF THE MOTION OF THE COMMONWEALTH OF PENNSYLVANIA FOR A PRELIMINARY INJUNCTION**

**MEMORANDUM IN SUPPORT OF MOTION FOR LEAVE TO APPEAR AS *AMICI CURIAE* AND TO FILE AN *AMICUS* BRIEF IN SUPPORT OF THE MOTION OF THE COMMONWEALTH OF PENNSYLVANIA FOR A PRELIMINARY INJUNCTION**

**PROPOSED ORDER GRANTING MOTION FOR LEAVE TO APPEAR AS *AMICI CURIAE* AND TO FILE AN *AMICUS* BRIEF IN SUPPORT OF THE MOTION OF THE COMMONWEALTH OF PENNSYLVANIA FOR A PRELIMINARY INJUNCTION**

on all parties via the Court's ECF system, as permitted by Local Rule 8(a). I declare under penalty of perjury that the foregoing is true and correct.

Executed at New York, New York this 27th day of November, 2017.

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Jamie A. Levitt  
(typed)

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/s/ *Jamie A. Levitt*  
(signature)